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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT 3 SHERMAN DIVISION</p> <p>3 YOUNG CONSERVATIVES OF) 4 TEXAS FOUNDATION) 5) 6 VS.) CIVIL ACTION NO. 7) 4:20-CV-973 8 THE UNIVERSITY OF NORTH) 9 TEXAS, THE UNIVERSITY OF) 10 NORTH TEXAS SYSTEM, NEAL) HONORABLE SEAN D. JORDAN 11 SMATRESK, PRESIDENT OF THE) 12 UNIVERSITY OF NORTH TEXAS,) 13 AND SHANNON GOODMAN, VICE) 14 PRESIDENT FOR ENROLLMENT OF) 15 THE UNIVERSITY OF NORTH) 16 TEXAS)</p> <p>11 *****</p> <p>12</p> <p>13 ORAL DEPOSITION 14 OF 15 SHANNON MICHAEL GOODMAN 16 TAKEN VIA ZOOM 17 NOVEMBER 12, 2021 18</p> <p>19 *****</p> <p>20 ORAL DEPOSITION OF SHANNON MICHAEL GOODMAN, taken 21 remotely via the Zoom platform, produced as a Witness at 22 the instance of the Plaintiff, and duly sworn, was taken 23 in the above-styled and numbered cause on the 12th day of 24 November, 2021, from 1:28 p.m. to 2:06 p.m., before JUDY 25 A. COUGHENOUR JOHNSON, Certified Shorthand Reporter No.</p>	<p>1 APPEARANCES (CONTINUED)</p> <p>2 Reported By: 3 JUDY A. COUGHENOUR & ASSOCIATES BY: JUDY A. COUGHENOUR JOHNSON 4 8109 Asmara Drive Austin, TX 78750 5 PH: (512) 346-4707 e-mail: Jude@prodigy.net</p> <p>6 7 *****</p> <p>8 STIPULATIONS</p> <p>9 The attorneys for all parties present stipulate and 10 agree to the following items: 11 THAT the deposition of SHANNON MICHAEL GOODMAN is 12 taken pursuant to Notice; 13 THAT by agreement of Counsel and all parties 14 present, the Reporter was allowed to swear in the Witness 15 remotely; 16 THAT all objections will be made pursuant to the 17 Federal Rules of Civil Procedure; 18 AND THAT the original transcript will be submitted 19 for signature to the Witness' attorney, SANDY 20 HELSUMS-GOMEZ, and that the Witness or the Witness' 21 attorney will return the signed transcript to JUDY A. 22 COUGHENOUR & ASSOCIATES within thirty days of the date the 23 transcript is provided to the Witness' attorney. If not 24 returned, the Witness may be deemed to have waived the 25 right to make the changes, and an unsigned copy may be</p>
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<p>1 1198, in and for the State of Texas, reported by machine 2 shorthand at THE UNIVERSITY OF NORTH TEXAS, DENTON, TEXAS, 3 the location of the Witness, pursuant to the Federal Rules 4 of Civil Procedure and the provisions stated on the record 5 or attached herein. 6 ***** 7 APPEARANCES 8 For Plaintiff: 9 TEXAS PUBLIC POLICY FOUNDATION BY: CHANCE WELDON 10 - AND - CHRISTIAN TOWNSEND 11 901 Congress Avenue Austin, TX 78701 12 PH: (512) 472-2700 e-mail: Cweldon@texaspolicy.com</p> <p>13 For Defendants: 14 15 HUSCH BLACKWELL BY: SANDY HELSUMS-GOMEZ 600 Travis Street 16 Suite 2350 Houston, TX 77002 17 PH: (713) 647-6800 e-mail: Sandy.gomez@huschblackwell.com</p> <p>18 - AND - 19 20 HUSCH BLACKWELL BY: PAIGE DUGGINS-CLAY 111 Congress Avenue 21 Suite 1400 Austin, TX 78701 22 PH: (512) 472-5456 e-mail: Paige.duggins-clay@huschblackwell.com</p> <p>23 Also Present: 24 25 NANCY MARTIN, HOST DOLLY GARCIA</p>	<p>1 used as though signed. 2 ***** 3 INDEX 4 Appearances..... 2 5 Stipulations..... 3 6 Exhibits..... 4 7 SHANNON MICHAEL GOODMANJ 8 Examination by Mr. Weldon..... 5 9 Witness Changes and Corrections..... 32 10 Witness Signature..... 33 11 Court Reporter Certificate..... 34 12 ***** 13 EXHIBITS 14 EXHIBIT PAGE PAGE NUMBER DESCRIPTION MARKED REF'D 15 16 1 Being biographical information on Shannon Goodman from the Office of 17 the President (/) 31 10 18 2 Being a University of North Texas Division of Enrollment 2021-2022 19 Organizational Chart 31 13 20 3 Being a copy of Texas Education Code, Section 54.051, Tuition Rates 31 17 21 22 4 Being a copy of Texas Education Code, Section 54.052, Determination of Resident Status 31 20 23 24 25</p>

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<p>1 THE REPORTER: Today's date is November 12, 2 2021, and the time is 1:27 p.m. 3 My name is Judy Coughenour Johnson, Judy A. 4 Coughenour & Associates, 8109 Asmara Drive, Austin, Texas. 5 This is the oral deposition of Shannon 6 Michael Goodman, and it is being conducted remotely, by 7 agreement of Counsel, with the Witness located at the 8 University of North Texas, Denton, Texas. 9 Will the Witness please raise your right 10 hand and be sworn? 11 * * * * 12 13 SHANNON MICHAEL GOODMAN 14 the Witness herein, having been first duly administered an 15 oath or affirmation, via Zoom, pursuant to the agreement 16 of Counsel, testified as follows: 17 18 EXAMINATION 19 QUESTIONS BY MR. WELDON: 20 THE REPORTER: Thank you. 21 I have administered the oath, the Witness 22 having been identified to me by attestation of Counsel. 23 Would Counsel, and all other persons 24 present in the rooms, please identify yourselves, and your 25 locations, for the record?</p>	<p>1 (Ms. Garcia came in to the camera view.) 2 MR. WELDON: Thank you. 3 MS. HELLUMS-GOMEZ: Does that work? 4 (The Reporter indicated that now Mr. Weldon 5 could begin at any time.) 6 MR. WELDON: Okay. 7 Q (Mr. Weldon) Would you please state your name 8 for the record? 9 MR. WELDON: I think - I think they're on - 10 I think they're on mute. 11 MS. HELLUMS-GOMEZ: Yeah. 12 A (The Witness) Shannon Goodman. 13 (The Reporter asked for a repeat of the 14 name.) 15 A (The Witness) Goodman. 16 Q (Mr. Weldon) And Mr. Goodman, have you ever 17 given a deposition before? 18 A I have not. 19 Q Okay. So then before we begin, I'd just like 20 to ask that for the purposes of getting a clear 21 transcript, you let me finish asking any questions before 22 you start your answer, and I'll extend the same courtesy, 23 by waiting for you to answer before I ask any additional 24 questions. Is that fair? 25 A That's fair.</p>
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<p>1 MR. WELDON: Chance Weldon, taking the 2 deposition. 3 I'm here in Austin, Texas. 4 MS. HELLUMS-GOMEZ: Sandy - excuse me - 5 Sandy Hellums-Gomez, Counsel for the Defendants. 6 I am present in Houston, Texas. 7 MS. DUGGINS-CLAY: Paige Duggins-Clay, 8 Counsel for the UNT, Defendants, and in Austin, Texas. 9 (The Reporter asked if there was anyone 10 else present with Mr. Weldon.) 11 MR. WELDON: Yeah. Yes. 12 MR. TOWNSEND: Yes. Christian Townsend in 13 Austin, Texas. 14 (The Reporter indicated Mr. Weldon 15 could begin at any time.) 16 MS. HELLUMS-GOMEZ: And - well, and - and 17 present in Denton, as well, is Miss Dolly Garcia, in-house 18 Counsel with UNT. 19 MR. WELDON: Can - can she be on camera? I 20 just - I can't see her, and I don't know who's in the 21 room. 22 So if she could just get back on camera, 23 that would be appreciated. 24 MS. HELLUMS-GOMEZ: Okay. Can you - does 25 that work for you, Dolly?</p>	<p>1 Q Okay. And it probably won't be necessary, but 2 if for any reason you need a break, just let me know. I 3 only ask that you answer any question that's pending at 4 the time before we break. Is that fair? 5 A That's fair. 6 Q Okay. Are you on any medication that would 7 prevent you from answering truthfully here today? 8 A No. 9 Q Okay. And do you have any medical condition 10 that would prevent you from answering truthfully here 11 today? 12 A No. 13 Q Okay. And you're currently employed by the 14 University of North Texas. Is that true? 15 A That's true. 16 Q Okay. And what is the title of your position 17 there? 18 A Vice-President for Enrollment. 19 Q Okay. And you're testifying here today in your 20 capacity as Vice-President of Enrollment. Is that true? 21 A That's true. 22 Q Okay. So how long have you been in that role? 23 A Approximately six and a half years, 24 approximately. 25 Q And as Vice-President of Enrollment, what</p>

<p style="text-align: right;">Page 9</p> <p>1 exactly do you oversee? What are you in charge of?</p> <p>2 A As far as units?</p> <p>3 Q Yeah.</p> <p>4 A Or the division?</p> <p>5 So I have University Admissions. I have</p> <p>6 Financial Aid and Scholarships. I have the Registrar</p> <p>7 Office. I have - the last six months, I have - I now have</p> <p>8 Student Financial Services. I have a unit that's called</p> <p>9 Enrollment Systems. And also oversee Welcome Center and</p> <p>10 University Tours.</p> <p>11 And then just administrative units, within.</p> <p>12 Like budget, you know, for - for the division.</p> <p>13 Q So if I --</p> <p>14 (The Reporter asked for a repeat of the</p> <p>15 last part of the Witness' answer.)</p> <p>16 A (The Witness) For the division. Just for - you</p> <p>17 know, for the administrative roles for the - for the</p> <p>18 division, itself.</p> <p>19 Q (Mr. Weldon) So do any of those departments or</p> <p>20 programs, that you oversee, involve the assessment of</p> <p>21 tuition at the University of North Texas?</p> <p>22 A I have a - a unit that's called Student</p> <p>23 Financial Services. They actually will assign or ensure</p> <p>24 that tuition has been assigned so that students are - are</p> <p>25 charged, and then they'll - they're also in charge of</p>	<p style="text-align: right;">Page 11</p> <p>1 before?</p> <p>2 A (The Witness) I think what you're pointing to</p> <p>3 is a Web page? Web site? Is that correct?</p> <p>4 A That - that - that is correct.</p> <p>5 And is this the - your biography that's on</p> <p>6 the University of North Texas Web site?</p> <p>7 A Yeah. It should be.</p> <p>8 I haven't looked at that site recently, but</p> <p>9 I'm assuming that's - that's what's there right now.</p> <p>10 Q Okay. And did you - did you sign off on this,</p> <p>11 or help create it?</p> <p>12 A Probably at the - I - I probably did sign off on</p> <p>13 it at the - at the time it was created. Yeah.</p> <p>14 Q Okay. Thank you.</p> <p>15 And can you look in this section here that</p> <p>16 says Bio Information? A couple of sentences down, where</p> <p>17 it says, "Mr. Goodman oversees UNT programs"?</p> <p>18 A Yes.</p> <p>19 Q Do you see that sentence?</p> <p>20 A Yes, I do.</p> <p>21 Q All right. And it says that you oversee the</p> <p>22 Eagle Express Tuition Plan. Correct?</p> <p>23 A That's correct. That's part of the Student</p> <p>24 Financial Services.</p> <p>25 Q Okay. And that tuition plan, that's going to</p>
<p style="text-align: right;">Page 10</p> <p>1 collecting those - and billing students for that.</p> <p>2 Q I'm sorry. Can you repeat the last - the last</p> <p>3 part of that statement? I don't - I couldn't understand</p> <p>4 you.</p> <p>5 A Sure.</p> <p>6 They - they ensure that the - the students</p> <p>7 are billed, and then they ensure that the - you know, they</p> <p>8 work on the fee payment, the collection side of that, as</p> <p>9 well.</p> <p>10 Q I'm going to introduce an exhibit, and let me</p> <p>11 see if I can pull it up here.</p> <p>12 This will be Exhibit 1.</p> <p>13 MR. WELDON: Can everybody see this? Are</p> <p>14 you all able to see that?</p> <p>15 (The Reporter indicated she could.)</p> <p>16 MS. HELLUMS-GOMEZ: Yes.</p> <p>17 A (The Witness) I - if - if that is in reference</p> <p>18 to a picture of me, yes.</p> <p>19 Q (Mr. Weldon) Okay.</p> <p>20 MR. WELDON: And I'm not sure.</p> <p>21 Do we have any way for them to be able to</p> <p>22 scroll through this, or do I need to just operate that?</p> <p>23 HOST: You'll need to operate that.</p> <p>24 MR. WELDON: Okay. Thank you.</p> <p>25 Q (Mr. Weldon) Have you ever seen this document</p>	<p style="text-align: right;">Page 12</p> <p>1 involve the cost of - of tuition for students at UNT,</p> <p>2 isn't it?</p> <p>3 A If - and that's an older plan that new students,</p> <p>4 I don't believe, can lock in to anymore.</p> <p>5 But yeah. That was - by students that</p> <p>6 chose that, were able to lock in those rates.</p> <p>7 Q Okay. And that's - and - and you said that's no</p> <p>8 longer available at the University or --</p> <p>9 A I don't believe we're doing Eagle Express</p> <p>10 anymore. We moved on to - the University moved on to Save</p> <p>11 and Soar Plan. That is a more recent one.</p> <p>12 So I think where students who had</p> <p>13 originally got on the Eagle Express will still continue on</p> <p>14 that, but I don't believe it's available to new students.</p> <p>15 I could be wrong on that, but I - I - I</p> <p>16 don't believe it is.</p> <p>17 Q Okay. Do you know if the cost of tuition is</p> <p>18 different for resident and nonresident students, at the</p> <p>19 University of North Texas?</p> <p>20 A There is a statutory tuition rate that is state</p> <p>21 defined through the legislature. They define a - what</p> <p>22 universities, such as us, can charge for a credit hour for</p> <p>23 resident, and they also define what is charged for</p> <p>24 nonresident.</p> <p>25 So that's the - that is the difference.</p>

<p style="text-align: right;">Page 13</p> <p>1 That's the rate that's different for residents and 2 nonresidents. That's that statutory, legislative rate 3 that's -- 4 Q Okay. 5 A -- defined. 6 Q So - so you would agree, though, that the rate 7 that is - that is charged is different? Correct? 8 A I would agree that the - yeah. That the 9 statutory rate is - there's a rate set for resident and a 10 rate set for nonresident. 11 Q And UNT complies with that state law, and 12 charges the different rates. Correct? 13 A That is correct. 14 Q Okay. I'm going to introduce a new exhibit, 15 Exhibit 2. 16 MR. WELDON: Can everybody see that? 17 MS. HELLUMS-GOMEZ: Yes. 18 MR. WELDON: Okay. 19 Q (Mr. Weldon) And - and Mr. - Mr. Goodman, do 20 you recognize the document on your screen? 21 A (The Witness) I can't see it all. I think 22 there are - might - the pictures, and stuff, are in front 23 of it. 24 But the part that I can see, yeah. Is - is 25 recognizable. Yes.</p>	<p style="text-align: right;">Page 15</p> <p>1 the University of North Texas Web site, would that sound 2 like - would - would you agree that that's reasonable? 3 That we probably got it there? 4 A Yes. 5 Q Okay. Now can you look directly beneath - 6 beneath your name there? There's a box relating to Chris 7 Foster. Can you see that? 8 A I can. 9 Q Actually, let me back up one question. 10 Would - does this appear to be an accurate 11 representation of the way that division is structured? 12 A Yes. 13 Q Okay. And is this one of the - earlier you 14 testified that you oversee several divisions. Is - this 15 is one of the divisions that you oversee? 16 A I oversee one - one singular division, the 17 Division of Enrollment. These are different departments 18 or units within that division. 19 Q Okay. 20 A Just -- 21 Q So is it - oh. I apologize. 22 So the things - but basically this is a - a 23 chart that shows all of the things that - all of the 24 divisions that you oversee with all - all of the 25 departments of the division that you oversee. Is that</p>
<p style="text-align: right;">Page 14</p> <p>1 Q Okay. And -- 2 (The Reporter asked for a repeat of the 3 last part of the Witness' answer.) 4 A (The Witness) All the way - well, it's - the 5 top - the - the teal boxes to Michael Sanders. I can see 6 part of what I believe is probably Brenda McCoy, who's - 7 who is now retired, and then the level that has - down 8 where it says Call Center, you know, starting from the 9 left, I can see those boxes. 10 Q (Mr. Weldon) I can - I can move that around a 11 little bit so you can see the rest of it. 12 Does that change anything? 13 A That allows me to see all the - I think the 14 lower boxes, and - and that's fine. I'm assuming there's 15 nothing off to the right that, you know, is different. 16 But what I can - what I can see looks 17 familiar. Yeah. 18 Q Okay. Do - can you - can you say what that - 19 what this document represents? 20 A This would be a - a - a high-level org chart of 21 the division. 22 Q Okay. 23 A Probably focusing in on who would be my direct 24 reports. 25 Q Okay. And if I told you that we got this from</p>	<p style="text-align: right;">Page 16</p> <p>1 correct? 2 A Correct. 3 Q Okay. So going back to the box in the middle 4 that - that refers to Chris Foster - you said you can see 5 that there. Right? 6 A Correct. 7 Q And from this chart, it looks like Mr. Foster 8 direct - reports directly to you. Is that correct? 9 A Correct. 10 Q Okay. So it would be fair to say that you 11 oversee his work. Is that correct? 12 A Yeah. I mean, I think that's fair. I oversee 13 Chris. Yeah. 14 Q Okay. Can you look at the box directly below 15 Mr. Foster's name? 16 A I can. 17 Q Okay. And that indicates that Mr. Foster is in 18 charge of tuition and fees assessment. Correct? 19 A It does. 20 Q Okay. And to your knowledge, when Mr. Foster 21 assesses tuitions and - tuition and fees, he complies with 22 state law. Correct? 23 A Correct. 24 Q And, you know, if, for some reason, Mr. Foster 25 collected fees in a way that didn't comply with state law,</p>

<p style="text-align: right;">Page 17</p> <p>1 you would have authority to correct him. Right?</p> <p>2 A Correct.</p> <p>3 Q I'd like to introduce Exhibit 3. And this is</p> <p>4 going to be a copy of - this should be a copy of the Texas</p> <p>5 Education Code.</p> <p>6 MR. WELDON: Can everybody see that?</p> <p>7 A (The Witness) I - yeah. I mean, I can see the</p> <p>8 page that I think you're bringing up.</p> <p>9 Q (Mr. Weldon) Yeah. We can scroll - we'll</p> <p>10 scroll through - we'll scroll through it, as necessary.</p> <p>11 A Yes.</p> <p>12 Q Yeah.</p> <p>13 Have you ever seen Texas Education Code,</p> <p>14 Section 54.051 before?</p> <p>15 A I have seen it before. Yes.</p> <p>16 Q Okay. And can you take a look at Section (b) on</p> <p>17 this page?</p> <p>18 A Okay.</p> <p>19 Q Okay. Would it be a fair summary to say that</p> <p>20 that section says the University shall collect tuition at</p> <p>21 the rates prescribed by this section?</p> <p>22 MS. HELSUMS-GOMEZ: Objection. Calls for a</p> <p>23 legal conclusion.</p> <p>24 A (The Witness) Yeah. I'm not - let me reread</p> <p>25 it, because I'm not sure exactly what you're asking, so</p>	<p style="text-align: right;">Page 19</p> <p>1 setting the formula for nonresident student tuition?</p> <p>2 MS. HELSUMS-GOMEZ: Objection. Calls for a</p> <p>3 legal conclusion.</p> <p>4 A (The Witness) Yeah. I would - that's kind of</p> <p>5 how I read it. Yes.</p> <p>6 Q (Mr. Weldon) Thank you.</p> <p>7 And you would agree that the formula, in</p> <p>8 Section (c), and the formula in Section (d), are</p> <p>9 different. Correct?</p> <p>10 MS. HELSUMS-GOMEZ: Objection. Calls for a</p> <p>11 legal conclusion.</p> <p>12 A (The Witness) Yeah. I mean, as I - as I read</p> <p>13 it, I - well, I - there are different way to come to it.</p> <p>14 I guess technically it could end up being</p> <p>15 the same if - the way it's calculated, the way it's</p> <p>16 stated, would come out with it. But yeah.</p> <p>17 Q (Mr. Weldon) Yeah.</p> <p>18 But there - but they are different</p> <p>19 formulas. Correct?</p> <p>20 A Yeah. The - the - the way they're stated, they</p> <p>21 seem to - the path to it is different, it sounds like.</p> <p>22 Yeah.</p> <p>23 Q Okay. And to your knowledge, the programs that</p> <p>24 you oversee at the University of North Texas, they comply</p> <p>25 with this law. Correct?</p>
<p style="text-align: right;">Page 18</p> <p>1 that --.</p> <p>2 Yeah. I mean, I think - is that - can you</p> <p>3 state your question again?</p> <p>4 Q (Mr. Weldon) Yeah. I was just saying is it</p> <p>5 fair to say that this section says that the college shall</p> <p>6 cause to be collected, from students, fees and rates</p> <p>7 prescribed in this section?</p> <p>8 A Under that Statute? So according to Statute?</p> <p>9 Is that what you're asking?</p> <p>10 Q Yes.</p> <p>11 A I think - I think that's fair.</p> <p>12 Q Yeah.</p> <p>13 Okay. Can you take a look at Section (c)?</p> <p>14 A Yes.</p> <p>15 Q And in Section (c), you would agree that section</p> <p>16 sets the formula for the tuition rate for resident</p> <p>17 students. Correct?</p> <p>18 MR. WELDON: Objection. Calls for a legal</p> <p>19 conclusion.</p> <p>20 A (The Witness) Yeah. I think - I mean, with -</p> <p>21 out of my understanding, I - I - I think so.</p> <p>22 Q (Mr. Weldon) Okay. If you take just a minute</p> <p>23 to look at Section (d), just beneath that?</p> <p>24 A Okay.</p> <p>25 Q Okay. And is it fair to say that that is</p>	<p style="text-align: right;">Page 20</p> <p>1 A To my understanding. Yes.</p> <p>2 Q Okay. I'd like to introduce another exhibit.</p> <p>3 That would be Exhibit 4.</p> <p>4 MR. WELDON: Can everybody see that?</p> <p>5 A (The Witness) I can - I can see your screen.</p> <p>6 Yeah.</p> <p>7 Q (Mr. Weldon) Okay. Great.</p> <p>8 And that - that looked - that appears, to</p> <p>9 you, to be Texas Education Code, Section 54.052?</p> <p>10 A That's what it's stated. Yeah.</p> <p>11 Q Yeah. And have you seen this section of the</p> <p>12 Texas Education Code before?</p> <p>13 A I have. Yes.</p> <p>14 Q Will you take a look at Section (a)?</p> <p>15 A Okay.</p> <p>16 Q And is it fair to say that that section says</p> <p>17 that this law establishes the standard for establishing</p> <p>18 residency? Is that correct?</p> <p>19 MS. HELSUMS-GOMEZ: Objection. Calls for a</p> <p>20 legal conclusion.</p> <p>21 A (The Witness) That - so state your - state your</p> <p>22 question again? I'm sorry.</p> <p>23 Q (Mr. Weldon) I'm sorry. The - this - the - the</p> <p>24 Section (a) basically makes clear that this section of the</p> <p>25 Texas Education Code sets the - the standard for</p>

<p style="text-align: right;">Page 21</p> <p>1 determining resident status. Is that correct?</p> <p>2 A I guess, on that, I don't - I don't know if - if</p> <p>3 (a) does that, in and of itself. I guess I've never tried</p> <p>4 to read it that way, but I think - are you talking about</p> <p>5 the - the entire - the 54.052, or are you talking about</p> <p>6 just that --</p> <p>7 Q Oh, yeah. And let me clarify.</p> <p>8 Section (a) indicates that, you know,</p> <p>9 Section 54.052 is the statute that sets - that governs the</p> <p>10 determination of resident status. Correct?</p> <p>11 MS. HELSUMS-GOMEZ: Yeah. Objection.</p> <p>12 Calls for a legal conclusion.</p> <p>13 A (The Witness) So yeah. I mean, as I - yeah.</p> <p>14 So for my understanding and knowledge,</p> <p>15 it's - it's that entire thing that begins to set</p> <p>16 the - the - the rules and - of what determines resident</p> <p>17 status.</p> <p>18 And I - I'm --</p> <p>19 Q (Mr. Weldon) Okay.</p> <p>20 A -- going to answer it - I hope I'm answering</p> <p>21 your question the way - what - what you're asking.</p> <p>22 Q Oh. You're - you're doing - you're doing fine.</p> <p>23 I'm just - let me - let me put it - put it to you this</p> <p>24 way.</p> <p>25 So then you would agree that Section 54.052</p>	<p style="text-align: right;">Page 23</p> <p>1 A (The Witness) So it's my understanding that the</p> <p>2 ApplyTexas is - is owned, if you will, by THECB, the Texas</p> <p>3 Higher Education Coordinating Board. They contract out to</p> <p>4 I think it's The University of Texas to actually help kind</p> <p>5 of maintain that application.</p> <p>6 But the reason I bring it up and it's</p> <p>7 relevant, is on that application, when students apply in</p> <p>8 Texas, and they use ApplyTexas, they will - they will use</p> <p>9 that application, and they'll fill out that front.</p> <p>10 There's a - a - for lack of a better term, there's like a</p> <p>11 profile that students have to create that they - they -</p> <p>12 they answer a series of questions there, and then they'll</p> <p>13 pick, you know, what institutions they want to apply to.</p> <p>14 But it's in that profile where the series</p> <p>15 of these questions regarding resident status, if you</p> <p>16 will - you know, this - this - that are asked, and that</p> <p>17 determination is made, and that determination then is</p> <p>18 passed to the universities.</p> <p>19 So then we take - we take what the results</p> <p>20 of that profile, of what happened on that application, and</p> <p>21 then the - they will pass us, you know, the resident or</p> <p>22 nonresident field, and then we - we take that and - and</p> <p>23 process it.</p> <p>24 Q So is it - is it your understanding, then, that</p> <p>25 ApplyTexas determines the resident status of students</p>
<p style="text-align: right;">Page 22</p> <p>1 is what sets the - you know, the standard for resident</p> <p>2 status. Correct?</p> <p>3 MS. HELSUMS-GOMEZ: Objection. Calls for a</p> <p>4 legal conclusion.</p> <p>5 A (The Witness) I - I - I believe so.</p> <p>6 Q (Mr. Weldon) And the divisions at the</p> <p>7 University of North Texas that you oversee, they</p> <p>8 faithfully apply Section 54.052 when determining resident</p> <p>9 status. Correct?</p> <p>10 A Well, can I - let me - can I explain kind of how</p> <p>11 that comes to us? That might help to this, because I want</p> <p>12 to try to make sure I'm answering your question.</p> <p>13 So the students - there's - I mean, I don't</p> <p>14 know if you're familiar with ApplyTexas? It's the state</p> <p>15 application. Are you - for admission. Are you familiar</p> <p>16 with that?</p> <p>17 Q Yeah.</p> <p>18 A So - so the ApplyTexas application that I - I</p> <p>19 believe - I think technically is probably - is owned, if</p> <p>20 you will, by the - the higher ed, so the THECB, the</p> <p>21 Texas --</p> <p>22 (The Reporter asked for a repeat of the</p> <p>23 last part of the Witness' answer which</p> <p>24 broke up.)</p> <p>25 Q (Mr. Weldon) I'm - I'm sorry. Can you --</p>	<p style="text-align: right;">Page 24</p> <p>1 based on 54 - 54.052?</p> <p>2 MS. HELSUMS-GOMEZ: Objection. Calls for a</p> <p>3 legal conclusion.</p> <p>4 A (The Witness) Yeah. I mean, functionally,</p> <p>5 those questions are asked there, and a - the answer to</p> <p>6 that will derive a value that they pass us, which is then</p> <p>7 either resident or nonresident.</p> <p>8 So yeah. In that sense, I would say - say</p> <p>9 that's probably a pretty accurate statement.</p> <p>10 Q (Mr. Weldon) I'm sorry. I'm just going to try</p> <p>11 and clean that up a little bit for the transcript. Was --</p> <p>12 A Sure.</p> <p>13 Q -- your - you - was - it was your conclusion,</p> <p>14 then, that ApplyTexas, that program, the questions they</p> <p>15 asked, are designed to get at the definition in 54.052?</p> <p>16 A (Witness nodded head up and down.)</p> <p>17 MS. HELSUMS-GOMEZ: Objection. And calls</p> <p>18 for speculation.</p> <p>19 A (The Witness) Yeah. I think that's - that's</p> <p>20 what I was trying to say.</p> <p>21 Q (Mr. Weldon) Okay.</p> <p>22 A Yeah.</p> <p>23 Q And once that determination is made, could you,</p> <p>24 at the - any of the departments you oversee, could they</p> <p>25 overturn that and say, "No. We think this student is a</p>

<p style="text-align: right;">Page 25</p> <p>1 resident, or is not a resident"?</p> <p>2 A No. I don't - I mean, no. Just - just to sit</p> <p>3 there and say, you know, "Shannon, no. I think he should</p> <p>4 be a - a - a - a resident," no. They don't have the</p> <p>5 authority or latitude.</p> <p>6 There are cases that - you know, a minority</p> <p>7 of - of applications that will come through that they will</p> <p>8 pass as - I think the code is Undetermined, and that's</p> <p>9 based on perhaps how somebody answered the - the - the</p> <p>10 question. They are coded as a nonresident, and then they</p> <p>11 are - they have to answer the questions again, and</p> <p>12 then provide documentation.</p> <p>13 That documentation is again prescribed by</p> <p>14 the Coordinating Board about what's acceptable. So we</p> <p>15 don't have any flexibility, you know, on - on that.</p> <p>16 Q So I'm trying to unpack what you just - what you</p> <p>17 just told me there.</p> <p>18 So like let's say that they're - well,</p> <p>19 let - let's do it this way.</p> <p>20 Are there any students - if - if you're</p> <p>21 going to apply to be a student at the University of North</p> <p>22 Texas, is there any way to do so outside of the ApplyTexas</p> <p>23 program?</p> <p>24 A Some of our students will come through an</p> <p>25 application called the Common App. And that - the Common</p>	<p style="text-align: right;">Page 27</p> <p>1 Q So is there like some sort of Statute that</p> <p>2 requires you to - to make applications available through</p> <p>3 ApplyTexas?</p> <p>4 MS. HELLUMS-GOMEZ: Objection. Calls for</p> <p>5 legal conclusion.</p> <p>6 A (The Witness) I honestly couldn't cite you</p> <p>7 that.</p> <p>8 It's just - it's my understanding that we -</p> <p>9 to be one - is that it - it's not - I do not believe we</p> <p>10 have a - or do not believe we have a choice to not be</p> <p>11 present in ApplyTexas. Let me answer it that way.</p> <p>12 Q (Mr. Weldon) Okay. But you also use the Common</p> <p>13 App. And - and let me make sure I'm saying this right.</p> <p>14 Common, like the word C-O-M-M-O-N, App?</p> <p>15 A Correct.</p> <p>16 Q Okay. And that was a choice made by the</p> <p>17 University of North Texas.</p> <p>18 A Correct.</p> <p>19 Q Okay. That would be similar to if I choose to</p> <p>20 use Microsoft Word, as opposed to WordPerfect. Correct?</p> <p>21 A Yeah. I mean, I guess, on a - on - on one</p> <p>22 level.</p> <p>23 Q Do you have any other - any other way that the</p> <p>24 University of North Texas establishes resident status,</p> <p>25 other than ApplyTexas or the Common App?</p>
<p style="text-align: right;">Page 26</p> <p>1 App. So it's another application process.</p> <p>2 And - but it has - it will have the same</p> <p>3 series of - of questions on there.</p> <p>4 Q And is - is that - is the Common App - I - I</p> <p>5 believe is what you called it - is that run by the</p> <p>6 University of North Texas?</p> <p>7 A The Common App is a - I don't - I don't know how</p> <p>8 to accurately phrase it - but we don't own the Common App.</p> <p>9 The Common App is a - is more of a - I'll say a national</p> <p>10 application, but it's - it's an application that schools</p> <p>11 in many states use, as well.</p> <p>12 Q Okay. And is that an app that you - that you</p> <p>13 have - that the University of North Texas has chosen to</p> <p>14 use?</p> <p>15 A Correct.</p> <p>16 Q Okay. And the same is - with ApplyTexas. Is</p> <p>17 that an app that the University of North Texas has chosen</p> <p>18 to use?</p> <p>19 A It's my understanding that was chose for us, and</p> <p>20 why - the reason I say that, I mean, is it is my</p> <p>21 understanding that we are - there is an expectation that</p> <p>22 we use that, from the Coordinating Board, so we have to be</p> <p>23 present in - in ApplyTexas.</p> <p>24 And so the vast majority of our</p> <p>25 applications come through ApplyTexas.</p>	<p style="text-align: right;">Page 28</p> <p>1 A A student - so every - both of those use this.</p> <p>2 A student who comes in and then perhaps later has now met</p> <p>3 this definition, because they have met one of the myriad</p> <p>4 of - of choices in there, could - could get a - a change -</p> <p>5 have their resident status changed after coming in, but</p> <p>6 everybody who initiates and comes in is done that way --</p> <p>7 Q So --</p> <p>8 A -- you know.</p> <p>9 Q -- over - the student you just described, who</p> <p>10 wants to have their resident status changed, what would be</p> <p>11 the process for that?</p> <p>12 A It would answer the same questions. They would</p> <p>13 then have to provide the documentation that's prescribed</p> <p>14 by the Coordinating Board that's acceptable.</p> <p>15 That would go through a - a committee,</p> <p>16 then, for review, to make sure that they've answered, and</p> <p>17 provided the answer correctly, and provided that</p> <p>18 documentation to support that. The documentation is what</p> <p>19 is acceptable to the - based on the Coordinating Board.</p> <p>20 Q And is that - is that committee in one of the,</p> <p>21 you know, departments that you oversee?</p> <p>22 A Yeah. Its a - I - I think there may be, and I</p> <p>23 don't know the - I - I don't know - so yes. The - the -</p> <p>24 the gist of it sits within my division, but there may be</p> <p>25 representation outside the division on the committee. I -</p>

Page 29	Page 31
<p>1 I can't tell you who the committee members are, off the</p> <p>2 top of --</p> <p>3 Q Okay.</p> <p>4 A -- my head.</p> <p>5 Q Okay. But the - the committee is within your</p> <p>6 division. Correct?</p> <p>7 A Correct.</p> <p>8 Q Okay. And do you understand that that</p> <p>9 committee, in - in - that's within the division you</p> <p>10 oversee, do you understand that it complies with state</p> <p>11 law?</p> <p>12 A Yes. They're using the same - same Statute</p> <p>13 and - and questions, and then the documentation that's</p> <p>14 prescribed by the Coordinating Board.</p> <p>15 Q Okay. I don't - let me just take a brief break.</p> <p>16 I don't think I have anything else, but I'm going to break</p> <p>17 for about five minutes, and then I'll come back. Okay?</p> <p>18 MS. HELLUMS-GOMEZ: Sure.</p> <p>19 A (The Witness) Fair enough.</p> <p>20 Q (Mr. Weldon) All right.</p> <p>21 THE REPORTER: We'll be off the record at</p> <p>22 2:01.</p> <p>23 (Recess from 2:01 p.m. to 2:04 p.m.)</p> <p>24 MR. WELDON: Okay. We don't have any other</p> <p>25 questions, at this time.</p>	<p>1 (The Certified Shorthand Reporter JUDY A.</p> <p>2 COUGHENOUR JOHNSON hereby states that</p> <p>3 Exhibit Nos. 1 through 4 were marked at</p> <p>4 the conclusion of the deposition, and the</p> <p>5 originals are to be attached to the</p> <p>6 original transcript of the deposition.)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 30	Page 32
<p>1 (Witness passed at 2:04 p.m.)</p> <p>2 MR. WELDON: And - and so unless you want</p> <p>3 to do any Redirect, Miss Gomez, I think we're - we're</p> <p>4 finished.</p> <p>5 MS. HELLUMS-GOMEZ: No, sir. We appreciate</p> <p>6 your time.</p> <p>7 MR. WELDON: Thank you.</p> <p>8 And Judy, what - what do you --</p> <p>9 THE REPORTER: This --</p> <p>10 MR. WELDON: -- think --</p> <p>11 THE REPORTER: -- concludes - this</p> <p>12 concludes the deposition at 2:04 p.m.</p> <p>13 And as far as the stipulations, there is no</p> <p>14 stipulation about the original transcript, and it will be</p> <p>15 filed directly with the attorney who asked the first</p> <p>16 question, Chance Weldon.</p> <p>17 Is that correct?</p> <p>18 MR. WELDON: That is correct.</p> <p>19 (A discussion was held regarding the</p> <p>20 stipulations and the Reporter was</p> <p>21 asked to go back on the record.)</p> <p>22 MS. HELLUMS-GOMEZ: Yes. We would like to</p> <p>23 stipulate that we would like the opportunity to review and</p> <p>24 sign the transcript.</p> <p>25 * * * * *</p>	<p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME: SHANNON MICHAEL GOODMAN</p> <p>3 DATE TAKEN: NOVEMBER 12, 2021</p> <p>4 PAGE LINE CHANGE REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p>

Page 33	Page 35
1 _____	1 ASSOCIATES, 8109 Asmara Drive, Austin, Texas, 78750, by
2 _____	2 December 16, 2021.
3 _____	3 THAT the amount of time used by each party at the
4 _____	4 deposition is as follows:
5 I, SHANNON MICHAEL GOODMAN, have read the foregoing	5 CHANCE WELDON - (36 minutes)
6 deposition and hereby affix my signature that the same is	6 SANDY HELMUM-GOMEZ - (00:00 minutes)
7 true and correct, except as noted above.	7 THAT \$270.84 is the deposition officer's charges
8	8 for preparing the original deposition transcript and any
9	9 copies of exhibits, charged to Plaintiff.
10 SHANNON MICHAEL GOODMAN	10 I further certify that I am neither Counsel for,
11 STATE OF _____	11 related to, nor employed by any of the parties in the
12 COUNTY OF _____	12 action in which this proceeding was taken, and further,
13 BEFORE ME, _____, on this	13 that I am not financially or otherwise interested in the
14 day personally appeared SHANNON MICHAEL GOODMAN, known to	14 outcome of the action.
15 me or proved to me, under oath, identity card, or other	15 SWORN TO by me this 15th day of November, 2021.
16 document, to be the person whose name is subscribed to the	16 <i>Judy A. Coughenour Johnson</i>
17 foregoing document and acknowledged to me that the same	17
18 was executed for the purposes and consideration therein	18 JUDY A. COUGHENOUR JOHNSON
19 expressed.	19 TEXAS CSR NO. 1198
20 GIVEN under my hand this ____ day of _____,	20 EXPIRATION DATE: 06/30/23
21 2021.	21 8109 Asmara Drive
22	22 Austin, Texas 78750
23 NOTARY PUBLIC IN AND FOR THE	23 PH: (512) 346-4707
24 STATE OF _____	24
25 MY COMMISSION EXPIRES ON: _____	25

Page 34
1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT
3 SHERMAN DIVISION
4 YOUNG CONSERVATIVES OF)
5 TEXAS FOUNDATION)
6)
7)
8 VS.)
9) CIVIL ACTION NO.
10 THE UNIVERSITY OF NORTH) 4:20-CV-973
11 TEXAS, THE UNIVERSITY OF)
12 NORTH TEXAS SYSTEM, NEAL) HONORABLE SEAN D. JORDAN
13 SMATRESK, PRESIDENT OF THE)
14 UNIVERSITY OF NORTH TEXAS,)
15 AND SHANNON GOODMAN, VICE)
16 PRESIDENT FOR ENROLLMENT OF)
17 THE UNIVERSITY OF NORTH)
18 TEXAS)
19 *****
20 REPORTER'S CERTIFICATION
21 DEPOSITION OF SHANNON MICHAEL GOODMAN
22 NOVEMBER 12, 2021
23 *****
24 I, JUDY A. COUGHENOUR JOHNSON, a Certified
25 Shorthand Reporter in and for the State of Texas, do
hereby certify to the following:
THAT the Witness, SHANNON MICHAEL GOODMAN, was duly
sworn by the officer, and that the transcript of the oral
deposition is a true record of the testimony given by the
Witness;
THAT the deposition transcript was submitted on
November 16, 2021 to the attorney for Defendants for
examination, signature, and return to JUDY A. COUGHENOUR &

Page 29	Page 31																																																																																																														
<p>1 I can't tell you who the committee members are, off the</p> <p>2 top of --</p> <p>3 Q Okay.</p> <p>4 A -- my head.</p> <p>5 Q Okay. But the - the committee is within your</p> <p>6 division. Correct?</p> <p>7 A Correct.</p> <p>8 Q Okay. And do you understand that that</p> <p>9 committee, in - in - that's within the division you</p> <p>10 oversee, do you understand that it complies with state</p> <p>11 law?</p> <p>12 A Yes. They're using the same - same Statute</p> <p>13 and - and questions, and then the documentation that's</p> <p>14 prescribed by the Coordinating Board.</p> <p>15 Q Okay. I don't - let me just take a brief break.</p> <p>16 I don't think I have anything else, but I'm going to break</p> <p>17 for about five minutes, and then I'll come back. Okay?</p> <p>18 MS. HELSUMS-GOMEZ: Sure.</p> <p>19 A (The Witness) Fair enough.</p> <p>20 Q (Mr. Weldon) All right.</p> <p>21 THE REPORTER: We'll be off the record at</p> <p>22 2:01.</p> <p>23 (Recess from 2:01 p.m. to 2:04 p.m.)</p> <p>24 MR. WELDON: Okay. We don't have any other</p> <p>25 questions, at this time.</p>	<p>1 (The Certified Shorthand Reporter JUDY A.</p> <p>2 COUGHENOUR JOHNSON hereby states that</p> <p>3 Exhibit Nos. 1 through 4 were marked at</p> <p>4 the conclusion of the deposition, and the</p> <p>5 originals are to be attached to the</p> <p>6 original transcript of the deposition.)</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>																																																																																																														
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<p>1 (Witness passed at 2:04 p.m.)</p> <p>2 MR. WELDON: And - and so unless you want</p> <p>3 to do any Redirect, Miss Gomez, I think we're - we're</p> <p>4 finished.</p> <p>5 MS. HELSUMS-GOMEZ: No, sir. We appreciate</p> <p>6 your time.</p> <p>7 MR. WELDON: Thank you.</p> <p>8 And Judy, what - what do you --</p> <p>9 THE REPORTER: This --</p> <p>10 MR. WELDON: -- think --</p> <p>11 THE REPORTER: -- concludes - this</p> <p>12 concludes the deposition at 2:04 p.m.</p> <p>13 And as far as the stipulations, there is no</p> <p>14 stipulation about the original transcript, and it will be</p> <p>15 filed directly with the attorney who asked the first</p> <p>16 question, Chance Weldon.</p> <p>17 Is that correct?</p> <p>18 MR. WELDON: That is correct.</p> <p>19 (A discussion was held regarding the</p> <p>20 stipulations and the Reporter was</p> <p>21 asked to go back on the record.)</p> <p>22 MS. HELSUMS-GOMEZ: Yes. We would like to</p> <p>23 stipulate that we would like the opportunity to review and</p> <p>24 sign the transcript.</p> <p>25 *****</p>	<p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME: SHANNON MICHAEL GOODMAN</p> <p>3 DATE TAKEN: NOVEMBER 12, 2021</p> <table><tr><th>PAGE</th><th>LINE</th><th>CHANGE</th><th>REASON</th><th>Clarification.</th></tr><tr><td>5</td><td>7</td><td>15</td><td>"Goodman" to "Shannon Goodman"</td><td></td></tr><tr><td>6</td><td>8</td><td>21</td><td>"That's true" to "That's true, Vice President for Enrollment."</td><td></td></tr><tr><td>7</td><td>16</td><td>2</td><td>Add "the chart shows my direct reports and their areas</td><td></td></tr><tr><td>8</td><td></td><td></td><td>of responsibility."</td><td>Clarification.</td></tr><tr><td>9</td><td>23</td><td>9</td><td>"front" to "form"</td><td>Clarification.</td></tr><tr><td>10</td><td></td><td></td><td></td><td></td></tr><tr><td>11</td><td></td><td></td><td></td><td></td></tr><tr><td>12</td><td></td><td></td><td></td><td></td></tr><tr><td>13</td><td></td><td></td><td></td><td></td></tr><tr><td>14</td><td></td><td></td><td></td><td></td></tr><tr><td>15</td><td></td><td></td><td></td><td></td></tr><tr><td>16</td><td></td><td></td><td></td><td></td></tr><tr><td>17</td><td></td><td></td><td></td><td></td></tr><tr><td>18</td><td></td><td></td><td></td><td></td></tr><tr><td>19</td><td></td><td></td><td></td><td></td></tr><tr><td>20</td><td></td><td></td><td></td><td></td></tr><tr><td>21</td><td></td><td></td><td></td><td></td></tr><tr><td>22</td><td></td><td></td><td></td><td></td></tr><tr><td>23</td><td></td><td></td><td></td><td></td></tr><tr><td>24</td><td></td><td></td><td></td><td></td></tr><tr><td>25</td><td></td><td></td><td></td><td></td></tr></table>	PAGE	LINE	CHANGE	REASON	Clarification.	5	7	15	"Goodman" to "Shannon Goodman"		6	8	21	"That's true" to "That's true, Vice President for Enrollment."		7	16	2	Add "the chart shows my direct reports and their areas		8			of responsibility."	Clarification.	9	23	9	"front" to "form"	Clarification.	10					11					12					13					14					15					16					17					18					19					20					21					22					23					24					25				
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1	1 ASSOCIATES, 8109 Asmara Drive, Austin, Texas, 78750, by
2	2 December 16, 2021.
3	3 THAT the amount of time used by each party at the
4	4 deposition is as follows:
5 I, SHANNON MICHAEL GOODMAN, have read the foregoing	5 CHANCE WELDON - (36 minutes)
6 deposition and hereby affix my signature that the same is	6 SANDY HELLM-GOMEZ - (00:00 minutes)
7 true and correct, except as noted above.	7 THAT \$270.84 is the deposition officer's charges
8	8 for preparing the original deposition transcript and any
9	9 copies of exhibits, charged to Plaintiff.
10 SHANNON MICHAEL GOODMAN	10 I further certify that I am neither Counsel for,
11 STATE OF TEXAS	11 related to, nor employed by any of the parties in the
12 COUNTY OF DENTON	12 action in which this proceeding was taken, and further,
13 BEFORE ME, <u>Alicia A. Spencer</u> , on this	13 that I am not financially or otherwise interested in the
14 day personally appeared SHANNON MICHAEL GOODMAN, known to	14 outcome of the action.
15 me or proved to me, under oath, identity card, or other	15 SWORN TO by me this 15th day of November, 2021.
16 document, to be the person whose name is subscribed to the	16 <i>Judy A. Coughenour Johnson</i>
17 foregoing document and acknowledged to me that the same	17
18 was executed for the purposes and consideration therein	18 JUDY A. COUGHENOUR JOHNSON
19 expressed.	18 TEXAS CSR NO. 1198
20 GIVEN under my hand this <u>7th</u> day of <u>December</u> ,	19 EXPIRATION DATE: 06/30/23
21 2021.	19 8109 Asmara Drive
22 <i>Alicia A. Spencer</i>	20 Austin, Texas 78750
23 NOTARY PUBLIC IN AND FOR THE	20 ALICIA A. SPENCER
24 STATE OF TEXAS	20 Notary Public, State of Texas
25 MY COMMISSION EXPIRES ON:	20 Comm. Expires 09-07-2024
<u>September 7, 2024</u>	20 Notary ID 129110246
	25

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT
3 SHERMAN DIVISION
4 YOUNG CONSERVATIVES OF)
5 TEXAS FOUNDATION)
6)
7)
8 VS.)
9) CIVIL ACTION NO.
10 THE UNIVERSITY OF NORTH) 4:20-CV-973
11 TEXAS, THE UNIVERSITY OF)
12 NORTH TEXAS SYSTEM, NEAL) HONORABLE SEAN D. JORDAN
13 SMATRESK, PRESIDENT OF THE)
14 UNIVERSITY OF NORTH TEXAS,)
15 AND SHANNON GOODMAN, VICE)
16 PRESIDENT FOR ENROLLMENT OF)
17 THE UNIVERSITY OF NORTH)
18 TEXAS)
19 *****
20 REPORTER'S CERTIFICATION
21 DEPOSITION OF SHANNON MICHAEL GOODMAN
22 NOVEMBER 12, 2021
23 *****
24 I, JUDY A. COUGHENOUR JOHNSON, a Certified
25 Shorthand Reporter in and for the State of Texas, do
hereby certify to the following:
THAT the Witness, SHANNON MICHAEL GOODMAN, was duly
sworn by the officer, and that the transcript of the oral
deposition is a true record of the testimony given by the
Witness;
THAT the deposition transcript was submitted on
November 16, 2021 to the attorney for Defendants for
examination, signature, and return to JUDY A. COUGHENOUR &